In the event of BPL interference to licensed services, NPRM Docket 03-104 places the burden of initiating corrective action on the shoulders of the licensed services. As a practical matter, the proposed rules offer no protection at all to licensed Amateur mobile and portable stations. It is inappropriate to favor unlicensed Part 15 devices and systems over licensed HF services. One simple reason BPL should not be implemented is that licensed Amateur Radio operators moving into or operating temporarily from a location where BPL interference exists will have no practical means to insure elimination of such interference. In addition to inconvenience to the licensed Amateur, this could have serious consequences in disaster operations.

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